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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

For Authority To Decrease Its Rate And
Charges For Electric And Gas Service And
Increase Rates And Charges For Pipeline
Expansion Service-Test Year 1996 General
Rate Case Consolidated With I9502015

Application 94-12-005
(Filed: December 9, 1994)

Commission Order Instituting Investigation
Into Rates, Charges, Service And Practices Of
PG&E; Consolidates With A9412005;
Authority Applies To A9212043 et al.

Investigation 95-02-015
(Filed: February 22, 1995)

Commission Order Instituting Rulemaking, To
Develop Standards For Electric System
Reliability And Safety Pursuant To D96-09-
073. Consolidated With I95-02-015

Rulemaking 96-11-004
(Filed: November 6, 1996)

PUBLIC VERSION

**PACIFIC GAS AND ELECTRIC COMPANY'S
ANNUAL REPORT ON COMPLIANCE
WITH GENERAL ORDER 166
COMPLIANCE PERIOD: JULY 1, 2014 TO JUNE 30, 2015**

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Dated: November 2, 2015

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PUBLIC VERSION

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

For Authority To Decrease Its Rate And Charges For Electric And Gas Service And Increase Rates And Charges For Pipeline Expansion Service-Test Year 1996 General Rate Case Consolidated With I9502015	Application 94-12-005
Commission Order Instituting Investigation Into Rates, Charges, Service And Practices Of PG&E; Consolidates With A9412005; Authority Applies To A9212043 et al.	Investigation 95-02-015 (Filed: December 9, 1994)
Commission Order Instituting Rulemaking, To Develop Standards For Electric System Reliability And Safety Pursuant To D96-09-073. Consolidated With I95-02-015	Rulemaking 96-11-004

PUBLIC VERSION

**PACIFIC GAS AND ELECTRIC COMPANY'S
ANNUAL REPORT ON COMPLIANCE
WITH GENERAL ORDER 166
COMPLIANCE PERIOD: JULY 1, 2014 TO JUNE 30, 2015**

Pursuant to General Order 166, Standard 11, Pacific Gas and Electric Company (PG&E) hereby submits its annual report on compliance with General Order 166 for the period July 1, 2014 through June 30, 2015 (Compliance Period). This report documents PG&E's compliance with each of the thirteen standards of the General Order.

Standard 1. Emergency Response Plan

Standard One requires PG&E to prepare an emergency response plan and update the plan annually. The 2014 PG&E Emergency Response Plan (Plan) consists of the following four individual plans:

1. Company Emergency Plan (Exhibit A)
2. Electric Emergency Operations Plan (Exhibit B)
3. Emergency Communications Plan (Exhibit C)
4. Emergency Operations Plan - Workforce Management/Customer Service Business Operations/Contact Center Operations (Exhibit D)

The Plan covers each of the ten required elements specified in Standard One. Attached as Exhibit E is a table identifying the ten elements and where they are covered within the Electric Emergency Operations Plan (EEOP), Fire Prevention Plan (Exhibit L), or other plan elements.

PG&E reviewed each of the four individual plans during the compliance period, and made updates, as appropriate. A description of the changes made in the items listed above is attached as Exhibit F.

Standard 2. Mutual Assistance Agreements

Standard Two requires PG&E to negotiate mutual assistance agreements with other utilities. PG&E has a mutual assistance agreement with the California Utilities Emergency Association (CUEA), representing a number of other California electric and gas utilities. PG&E also entered into the Western Area Power Administration Agreement (WAPAA) and Western Regional Mutual Assistance Agreement (WRMAA) with an association of electric and gas utilities in the Western US and Canada, including Arizona Public Service, BC Hydro, Bonneville Power, Liberty Energy, Los Angeles Department of Water & Power, PacifiCorp, Public Service Company of New Mexico, Sacramento Municipal Utilities District, Southern California Edison, and Southwest Gas. The agreements incorporate the items listed in Standard Two. In addition, PG&E has a mutual assistance agreement with Trinity County Public Utilities District (TCPUD) and Florida Power and Light (FPL). Copies of these agreements are included in the Plan (Exhibit A, Annex C) or attached as Exhibit G.

Standard 3. Emergency Training and Exercises

Standard Three requires PG&E to conduct annual emergency training and exercises using PG&E's Emergency Response Plan. PG&E complied with this standard by completing the following during the compliance period:

- A. PG&E exercised its Plan in its annual exercise held on May 13 and 14, 2015. The goal of this two-day full-scale exercise was to simulate a catastrophic earthquake and evaluate if the recently revised emergency plans were effective. Specifically, the Company exercise was designed to test new technology and processes that were recently implemented to improve PG&E's response to a catastrophic incident, such as: damage models and assessments, rapid logistics support, gas leak detection tools, and portable information technology. (Refer to Exhibit H for additional details.)

The exercise involved over 750 employees, and included the following agencies: PG&E, California Energy Commission (CEC), California Independent System Operator (CAISO), California Public Utilities Commission (CPUC), Department of Energy, American Red Cross, Marin County Office of Emergency Services (OES), California Office of Emergency Services (Cal OES), Consolidated Edison of NY, Edison Electric Institute, Port of San Francisco, San Francisco Department of Emergency Management (SFDEM), and the Federal Emergency Management Agency (FEMA).

- B. Standard Three also requires PG&E to submit an evaluation on its response to an exercise or major outage where that outage serves in lieu of the annual emergency exercise. The Company's Annual Emergency Exercise Summary is included in Exhibit H and contains information on primary areas of improvement and major strengths.
- C. PG&E also met the requirements of Standard Three by conducting several additional training programs to prepare designated personnel for emergencies and major outages, and to address specific issues in its Plan. These programs included two web-based Incident Command System (ICS) courses, several instructor-led advanced ICS courses, and trainings/exercises at the regional, divisional, and transmission levels that were designed to overcome previously identified problems in exercises and responses.

PG&E's ICS training program emphasizes the value of using ICS to set objectives, measure performance, create manageable spans of control, and plan event response. PG&E offered online ICS training for ICS-100 and ICS-200, and a classroom, company-specific form of ICS 300 and 400. During the compliance period, 418 employees completed the ICS-100 course, and 345 participants completed ICS 200. A total of 75 employees completed the advanced ICS-300/400 training and National Incident Management System (NIMS) training..

In addition, the following training sessions and tabletop exercises were conducted at the regional, divisional, and transmission levels during the compliance period:

- Preparedness trainings were held throughout the service area with a combined total of 614 attendees. The workshops included training, such as: storm response, PG&E emergency plans, incident management (ICS Roles and Responsibilities), Resource Management Tool, Outage Management Tool, job packet creation, emergency activations, and Electric Transmission / Distribution coordination calls, etc.

- Region and division emergency centers were tested in the form of an activation or tabletop exercise during the compliance period. For example, throughout the regions in May and June 2015, four PG&E spring tabletop exercises were conducted with a total of 168 participants. These exercises focused on preparing PG&E personnel for summer heat and wildfires and trained staff on the following: ICS and overall incident management, resource coordination and management, and infrastructure/damage assessment.
- At the electric transmission level, PG&E participated as part of the California Electric Training Advisory Committee's (CETAC's) training and exercise program. Through this program, all of PG&E's system dispatchers were trained in emergency operations over a five-week period during March and April of 2015. The training also aimed to further facilitate coordination between PG&E and other utilities during transmission emergencies.
- Additional transmission-level exercises during the compliance period included: (1) three regional transmission restoration exercises (with a combined total of 127 participants); (2) PG&E's System-Wide Exercise in November 2014, where 111 people participated, [including external agencies such as: CAISO, Sacramento Municipal Utility District (SMUD), Trans Bay Cable (TBC), Cal Pine, Western Area Power Authority (WAPA), etc.]; and (3) an annual EEP exercise on April 29, 2015 with 57 participants that focused on managing capacity shortages by implementing rotating outages.

D. Per the requirements in Standard Three, notices were sent to the following agencies at least ten days in advance of the May 13 – 14, 2015 Company Exercise: CPUC on April 29, emergency offices of the counties in which the exercise was performed and all other external agencies listed in 3A were notified on March 3, 2015.

PG&E also met the requirements of Standard Three by participating in exercises that were led by our governmental partners. Many of the external trainings and exercises that PG&E participated in during the compliance period were hosted by local agencies, but included planners and participation from operational area, regional, and state-level entities. The diversity and collaborative planning provided the opportunity for PG&E to interact and share information with a broad range of public sector partners.

For example, in the Alameda County Earthquake Exercise Series, PG&E was involved on the planning team, assisted in the facilitation of the January 2015 tabletop exercise, and participated as part of Alameda County's emergency staff in the June 2015 exercise. Representatives from various city, county, and state agencies also participated. PG&E's level of contribution and participation demonstrated its commitment to being a community partner, and provided vital information on how PG&E coordinates and collaborates with its public sector partners following a catastrophic earthquake.

In September 2014, PG&E participated in a Cyber Risk Preparedness Exercise, hosted by the North American Electric Reliability Corporation (NERC). The purpose of the exercise was to provide participants with an opportunity to evaluate current response concepts, plans and capabilities for a response to a cyber incident. At PG&E, the tabletop exercise focused on PG&E's first response procedures, public information sharing, critical leadership decision-making, and command and control procedures to ensure the safety of the public and its interaction with local first responders. In addition to partnering with NERC, PG&E's local Federal Bureau of Investigation (FBI) partners also participated.

In October 2014, PG&E participated as an evaluator in Southern California Edison's full-scale earthquake response exercise.

Over five weeks in March/April 2015, 75 PG&E System Dispatchers and Hydroelectric operators participated in the PEAK RC Restoration exercises for the WECC.

In February 2015, PG&E representatives from Emergency Management, Government Relations, and Energy Solutions and Sales departments participated in a full-scale exercise in San Mateo County's Emergency Operations Center (EOC). Some PG&E staff also participated on the exercise planning team. During the exercise, PG&E demonstrated how PG&E communicates and responds during a major flood event.

PG&E led a tabletop exercise in March 2015 that was jointly sponsored by the Amador and Calaveras Offices of Emergency Services. The exercise helped identify issues with electric distribution facilities during a large-scale event, such as a major wildfire, flood, or winter storm.

In April 2015, PG&E staff participated during the planning phase and execution of a public health San Mateo County Silver Dragon full-scale exercise. During the exercise, PG&E was able to provide information on safety, simulated outages, restoration strategies, and how PG&E could be incorporated in the County EOC during an emergency event.

PG&E participated in a planning meeting in June 2015 for a full-scale exercise sponsored by Tuolumne and Calaveras County emergency management agencies. One purpose of this drill will be to identify issues with electric distribution facilities or services during a large-scale event.

PG&E also conducted drills in September 2014 and June 2015 at our electric substations for San Francisco Fire Department (SFFD) and Kern County Fire Department, enabling them to respond safely to emergencies at PG&E's substations. This resulted in improved emergency readiness and coordination between these departments and PG&E (15-20 people attended each drill). In addition to the first responders receiving information and a tour of the substations, the alarm systems were tested, and simulated rescues were conducted during a couple of the drills.

In addition, PG&E facilitated Power Generation Emergency Action Plan exercises that examined response to potential emergencies at hydroelectric power plants that may affect electric distribution operations in July, September, October, and December 2014. These tabletop exercises included local public safety agencies for each of the following hydro or electric projects: Potter Valley, Hass, King, Feather River, Sonora, Oakhurst, and Gateway.

Standard 4. Communications Strategy

Standard Four requires PG&E to develop a strategy for informing the public and relevant agencies of a Major Outage, as defined by this General Order.

- A. PG&E's strategy for communicating with the media, customers, regulatory agencies, and other governmental organizations is contained in its emergency plans entitled Emergency Communications Plan (Exhibit C) and Emergency Operations Plan - Workforce Management/Customer Service Business Operations/Contact Center Operations (Exhibit D).
- B. PG&E's coordination and communication strategy with state and local governmental agencies is contained within the Emergency Communications Plan (Exhibit C) and the EEOP (Exhibit B). Also, PG&E makes contact information for state and local government agencies widely available internally through the use of a website accessible to all PG&E emergency personnel. All names and phone numbers of county OES contacts are listed by link in the EEOP (Exhibit B) and are maintained by PG&E's Government Relations organization.
- C. For operational issues, the Grid Control Center (GCC) is the official point of contact with the CAISO and will notify the CAISO within ten minutes of any transmission-related

outages.¹ PG&E's plan for communicating and coordinating with the CAISO is contained in the EEOP (Exhibit B) and the Emergency Communications Plan (Exhibit C).

Standard 5. Activation Standard

Standard Five requires PG&E to coordinate internal activities during a major outage in a timely manner. PG&E's activation levels and the resource management process are set forth in the Company Emergency Plan (CEP) and EEOP.

PG&E did not experience a Major Outage, as defined by this General Order, during the compliance period.

Standard 6. Initial Notification Standard

Standard Six requires PG&E to notify relevant individuals and agencies of a major outage or other newsworthy event in a timely manner.

PG&E's initial notification procedures are set forth in the EEOP. PG&E generally treats "newsworthy events" as incidents which fall within the category of Level 3 or greater emergencies where the EOC is activated, as set forth in the CEP (Exhibit A) and EEOP (Exhibit B). PG&E notified the Commission and the Warning Center at OES of the following emergency events that met this criteria during the compliance period:

- August 24, 2014 Napa Earthquake
- December 10, 2014 Wind/Rain
- December 30, 2014 Wind/Rain
- February 6, 2015 Wind/Rain

PG&E did not experience a Major Outage, as defined by this General Order, during the compliance period.

Standard 7. Mutual Assistance Evaluation Standard

Standard Seven requires PG&E to evaluate the need for mutual assistance during a Major Outage, as defined by this General Order. PG&E's mutual assistance standard is set forth in the CEP (Exhibit A) and EEOP (Exhibit B).

PG&E did not experience a Major Outage, as defined by this General Order, during the Compliance Period.

¹ Pacific Gas and Electric (2012) *Transmission Operating Procedures*. (Utility Procedure: TD-1466P-02).

Standard 8. Major Outage and Restoration Estimate Communication Standard

Standard Eight requires PG&E to inform the public and relevant public safety agencies of the estimated time for restoring power during a major outage. PG&E did not experience a Major Outage, as defined by this General Order, during the compliance period.

Standard 9. Personnel Redeployment Planning Standard

Standard Nine requires PG&E to train additional personnel to assist with emergency activities during a major outage, (i.e. assessing damage and performing safety standby activities). PG&E's personnel redeployment plan for performing safety standby activities and assessing damage during a major outage is set forth in Section 4 of the EEOP (Exhibit B).

During the compliance period, PG&E did not experience a major outage, but conducted trainings for those who may perform safety standby or damage assessment in lieu of their normal duties.

Throughout the compliance period:

- Safety standby trainings were conducted for 1,697 non-traditional emergency response employees (such as Meter Readers, Gas Service Reps, Gas M&C, Gas T&R, Work & Resource Inspectors, Mappers, Estimators, etc.). The training included information on how to: (1) identify hazards in the electric distribution system, (2) stand by hazards safely, and (3) maintain safety for the public and themselves until qualified electric personnel arrive at the scene. (See Exhibit I for a list of employees trained.)
- 84 PG&E electric estimators were trained to safely perform rapid emergency field assessments during emergency response situations. (See Exhibit J for a list of employees trained.)

Standard 10. Annual Pre-Event Coordination Standard

Standard 10 requires PG&E to annually coordinate emergency preparations with the appropriate state, county, local agencies, and the CAISO.

As a member of the CUEA, PG&E met with the State OES to discuss emergency planning and response issues, as well as opportunities to support the respective organizations in a large-scale emergency. PG&E's Emergency Management Department's assigned representative on the Energy Committee of the CUEA met during the compliance period with the Executive Director, our liaison with the State OES, members of gas, electric and pipeline utilities, and the CAISO on emergency planning and response issues.

As a member of the Western Regional Mutual Assistance Association, PG&E met during the compliance period with gas, electric, water, and pipeline utilities throughout the Western United States, including Western Canada. The discussion involved emergency planning and response issues and opportunities to support the respective organizations in a large-scale emergency.

As noted in response to Standard Three, CAISO participated in PG&E's full-scale catastrophic earthquake exercise held on May 13 and 14, 2015, where PG&E's emergency plans were evaluated.

PG&E also invited state, county and local public agencies in its service territory to participate in the Company's trainings and exercises, as described in Section 7.2.1 of the EEOP and in Standard Three of this compliance report.

In addition, during the compliance period, PG&E conducted electric safety trainings and workshops for the following public agencies:

- 583 separate First Responder Workshops were held throughout PG&E's service area. The workshops were designed to educate first responders on emergencies involving electric and natural gas utility equipment and services. In the classes, information was provided on electric and gas utility infrastructure, how to recognize emergency conditions, best practices in handling utility-specific emergencies, and the "do's and don'ts" when on the scene of an emergency, and other first responder safe practices. (Refer to Exhibit M for a list of agencies that participated in the First Responder Workshops.)
- On September 15, 2014, PG&E provided electric safety training to SFFD on Treasure Island.
- On November 4, 2014, PG&E was invited to provide electrical safety training and an overview of the EEOP to key stakeholders in OES, Fire, Law, Public Works and Public Health at the County of Monterey Winter Preparedness Workshop.
- PG&E provided an overview of our EEOP, how PG&E responds to emergencies, and basic electric safety training to business owners from Paso Robles and other San Luis Obispo County business owners at a Paso Robles Business Continuity Workshop on November 5, 2014.
- On December 8 and 9, 2014, Public Safety Liaison Workshops were conducted in Santa Cruz and Salinas in order to provide electric and gas safety training and an overview of the EEOP and gas emergency plans to high-level representatives from fire and law enforcement agencies, the County OES, the University of California system, and local government officials. The information provided was well received and has enhanced working relationships in these Counties.

- At the Fire House World West event on January 25, 2015, electrical safety information was provided to several thousand fire agency representatives from across California and other western states, and follow up trainings were conducted for those agencies located within PG&E's service territory.
- PG&E was also invited for the fourth year in a row to participate in a Cal OES-sponsored Mobile Command Center Rally in April 2015. PG&E, along with local, regional, state, and federal agencies, demonstrated their communications technology and equipment that is used for emergencies and other events. PG&E presented information on the new communication technology that has been incorporated in its Mobile Command Vehicles, and informed participants how PG&E can incorporate into and support responses with our public sector partners.
- On June 11, 2015, PG&E participated in the Santa Clara County Public Safety Liaison Meeting and provided basic electric and gas safety training and an overview of the EEOP and gas emergency plans to representatives from fire, law enforcement, public works, city/county OES, and government officials from across Santa Clara County.

To further comply with Standard 10, PG&E confirmed contacts and communication channels, and exchanged emergency planning and response information with public agencies. For example, PG&E was a featured speaker at the California Interagency Wildland Fire Risk Management Conference on April 13, 2015. At this presentation, PG&E exchanged emergency planning and response information among the agencies responsible for wildland fire management in California.

PG&E also attended a pre-fire season meeting on April 9, 2015 with the Cal Fire Amador-El Dorado Unit and the El Dorado National Forest. The purpose of this meeting was to discuss fire season conditions, establish and confirm contacts and communication channels, plan the exchange of emergency planning and response information, discuss training, and exchange information for future collaboration.

Also during the compliance period, PG&E attended the United States Forest Service Incident Management Team Conference, the Cal Fire Incident Management Team Conference, and met with Merced County OES to establish and confirm contacts and communication channels and to exchange emergency planning and response information.

In addition, PG&E hosted an Inter-agency Fire Season Kickoff Meeting on May 29, 2015 with leadership from the U.S. Forest Service, Cal Fire, the Bureau of Land Management, and the National Park Service to discuss this year's fire season potential.

In response to California Assembly Bill (AB) 1650², PG&E invited representatives of cities and counties to a series of 20 regional public meetings to review and discuss PG&E's Electric Emergency Preparedness Plans. At each regional meeting, PG&E described its electric transmission and distribution system, PG&E's EEOP, storm forecasting and pre-event planning, PG&E's emergency management organization, mutual aid, public agency partners, and PG&E's Fire Prevention Plan (see Exhibit L). Participants were also provided an opportunity for questions and feedback on the plans.

To initiate this public outreach process, PG&E sent an email to city managers and county administrators throughout the Company's service territory announcing the regional meetings and inviting their city or county to designate a point of contact to attend. A copy of the invitation is included as Exhibit N, a roster of the city and county officials to whom the initial invitations were sent is attached as Exhibit O, the designated points of contact list and an email to the points of contact are included as Exhibit P, and a list of when and where the regional meetings were held is attached as Exhibit Q.

Currently, PG&E is party to an open proceeding (R.15-06-009) regarding regulation of physical security for electric supply facilities of electrical corporations, consistent with Public Utilities Code Section 364.1. This rulemaking is also opened to establish standards for disaster and emergency preparedness plans for electrical corporations and regulated water companies, consistent with Public Utilities Code Section 768.6.

The proceeding is currently in Phase I, which will focus on the requirements to address physical security risks to electrical supply facilities of electrical corporations. Additional phases will be conducted to address emergency and disaster preparedness plans of electrical corporations and regulated water companies.

Standard 11. Annual Report

Standard 11 requires PG&E to submit an annual report describing compliance with these standards and to report on the number of repair and maintenance personnel. This document constitutes PG&E's annual report on compliance with General Order 166 for the compliance period, and a description of all changes to the PG&E Emergency Response Plan is attached as Exhibit F. The number

2 Cal. Pub. Util. Code §768.6

of repair and maintenance personnel in each personnel classification for the compliance period is attached as Exhibit K.

Standard 12. Restoration Performance Benchmark for a Measured Event

Standard 12 requires PG&E to be subject to a restoration performance benchmark for measured events. As PG&E did not experience a Major Outage or measured event, as defined by this General Order during the compliance period, this standard does not apply.

Standard 13. Call Center Benchmark for a Measured Event

Standard 13 requires PG&E to be subject to a call center performance benchmark for measured events. As PG&E did not experience a Major Outage or measured event, as defined by this General Order during the compliance period, this standard does not apply.

Respectfully Submitted,

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